

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE FOREIGN EXCHANGE BENCHMARK RATES
ANTITRUST LITIGATION

No. 13 Civ. 07789 (LGS)

JOHN NYPL, et al.,

Plaintiffs,

-against-

JP MORGAN CHASE & CO., et al.,

Defendants

No. 15 Civ. 09300 (LGS)

JAMES CONTANT, et al.,

Plaintiffs,

-against-

BANK OF AMERICA CORP., et al.,

Defendants

No. 17 Civ. 03139 (LGS)

ALLIANZ GLOBAL INVESTORS GMBH, et al.,

Plaintiffs,

-against-

BANK OF AMERICA CORP., et al.,

Defendants

No. 18 Civ. 10364 (LGS)

[PROPOSED] ORDER REGARDING DEPOSITION COORDINATION

WHEREAS, plaintiffs in the four above-captioned actions (“Actions”) are prosecuting claims against one or more common defendants in the Actions (“Defendants”) based on allegations that the foreign exchange (“FX”) market was manipulated by some or all of the Defendants;

WHEREAS, Plaintiffs in the Actions will likely seek to depose many of the same witnesses in each of the Actions, including current or former employees of Defendants and relevant non-parties; and

WHEREAS, this Court wishes to minimize the burden on the potential deponents in the Actions, as well as to ensure efficient conduct of discovery in the Actions;

IT IS HEREBY ORDERED that:

1. Counsel for the Parties in the Actions shall meet and confer in good faith and propose to the Court within 60 days of this Order, a proposed order (“Proposed Deposition Protocol Order”), including any disputes, that would facilitate the scheduling of depositions in the Actions, so as to, among other things, (i) ensure the opportunity for all parties in the Actions to participate in any noticed deposition; and (ii) minimize the likelihood that any individual (other than experts) and Rule 30(b)(6) designees will be deposed multiple times in the Actions.
2. The Proposed Deposition Protocol Order shall also contain provisions to govern the noticing and taking of the depositions noticed in the Action. These provisions shall, without limitation, (i) include a procedure for noticing depositions; and (ii) govern the conduct of the parties during depositions, including the allocation and order among the Plaintiffs of questioning time.

Dated: _____
New York, New York

HON. LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE